

U.S. Department
of Transportation

United States
Coast Guard



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September 24, 1999

Center for Maritime Education
Attn: Mr. Jerry Tinkey
111 Kentucky Ave
Paducah, KY 42001

Dear Mr. ^{*Gerry*} Tinkey:

I would like to share some information which I believe will be of interest to you regarding Coast Guard policy for physical condition waivers for merchant marine license or document (MMD) applicants.

Current requirements for physical condition of applicants are contained in various parts of Title 46, Code of Federal Regulations (CFR), Parts 10, 12, and 13. Although these regulatory requirements are not specific, they assert that an individual must be physically qualified to hold certain licenses and MMDs. Additionally, Regulation I/9 of the International Convention on Standards of Training, Certification and Watchkeeping Code (STCW) requires each party (*i.e. the United States government for U.S. licensed mariners*) to establish minimum medical fitness standards for seafarers. Coast Guard Headquarters issued Navigation and Vessel Inspection Circular (NVIC) 2-98 to establish standards necessary to satisfy the physical condition requirements of 46 CFR and STCW. NVIC 2-98 is used by medical personnel to evaluate the physical condition of mariners, and by Coast Guard Regional Exam Centers (RECs) to evaluate the physical examination results submitted by mariners.

NVIC 2-98 contains a general listing of potentially disqualifying conditions. If a mariner has a medical condition listed as a disqualifying condition, he/she may request a waiver. Waivers are considered where extenuating circumstances are such to warrant special consideration and it can be demonstrated that the applicant can safely perform the duties of the license or merchant mariner document. Waiver packages should include a narrative from the physician describing the condition, the prognosis, any restrictions, and all medications prescribed.

Disqualifying prescription medications are listed in NVIC 2-98 and include the following: anticoagulants (Warfarin, Coumadin), systemic corticosteroids, psychotropic medications, and any other medication which would result in gradual deterioration of performance of duties, sudden incapacitation or otherwise compromise shipboard safety, including required response in an emergency situation. For prescribed medications not on the list but posing a threat to safety, the Director, National Maritime Center (NMC) will rule on a case-by-case basis.

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NMC recently solicited information from field RECs concerning medical waivers. NMC learned that some units were making decisions concerning medical conditions that should have been evaluated at the NMC level. Also, complaints from industry have suggested inconsistencies among RECs when evaluating physical examination results submitted by mariners. Therefore, NMC's future policy will require RECs to forward all cases involving a disqualifying medical condition listed in NVIC 2-98, or any questionable medical condition, to the NMC for final determination.

Since requests for physical waivers are forwarded to NMC for final determination, mariners need to be aware that some medical conditions could delay the issue/renewal process. A significant portion of the delay associated with medical waiver requests is attributed to the RECs solicitation of additional medical tests or information from the mariner. Mariners with potentially disqualifying conditions should provide the additional information, medical tests, reports or opinions required by NVIC 2-98 at the time of application. This will significantly decrease the time needed for the review process.

I hope this gives some insight as to the future of medical waiver submissions. Certainly, a "single clearinghouse" system will help to establish decision consistency.

If you have any questions or would like more info, please contact LCDR Danny LeBlanc at (504) 589-3042, *or call me!*

Sincerely,



C. T. DESMOND

Captain, U. S. Coast Guard

Chief, Marine Safety Division

By direction of the District Commander

Encl: (1) NVIC 2-98, "Physical Evaluation Guidelines for Merchant Mariner's Documents and Licenses."

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